

May 23, 2022

C. Jo Anne Wessinger Hill, Esq.
General Counsel to the Commission
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: Written Conflicts Check for Docket Nos. 2023-15-E, 2023-16-E, and 2023-17-E

Dear Ms. Wessinger Hill:

PA Consulting Group, LLC ("PA") confirms to the Public Service Commission of South Carolina ("Commission") that we have no potential conflicts of interest in evaluating the avoided cost rates, methodologies, terms, calculations, and conditions of the Avoided Cost filings contained in Docket Numbers 2023-15-E, 2023-16-E, and 2023-17-E. Our conflicts check was completed against Duke Energy Progress, LLC, Duke Energy Carolinas, LLC, Dominion South Carolina, Inc. ("Utilities") and the 43 current members of the Carolinas Clean Energy Business Association ("CCEBA members").

As the Terms and Conditions of our engagements with our clients typically prohibit PA from publicly identifying our clients' identities, we cannot individually identify the entities herein.

We confirm that we have conducted engagements with each of the Utilities and with several CCEBA members. Four of these engagements are currently active; however, we confirm we have no conflict of interest with these engagements as their nature and substance do not involve any South Carolina entities or assets. The prior engagements were concluded prior to May 2022.

We confirm that during the term of any engagement with the Commission related to the above referenced Dockets, PA will not engage with any of the Utilities on any matter.

PA's reputation is central to our success. Consequently, the firm always uses robust approaches to maintain the highest level of integrity. PA operates a process under which new assignments and presales are submitted to a client conflict check. This is carried out to ensure that, in undertaking the work, the firm would not risk acting against the interests of an existing (or in some cases prospective) client. The primary responsibility lies with the Member of PA's Management Group responsible for a new proposed assignment (or for an existing assignment if information about potential conflict between existing assignments comes to light), and the Client Conflicts Checking Process Sponsor is PA's Chief Executive Officer. If a potential conflict exists, PA's High Risk Assignment Steering Committee will determine measures that must be taken to mitigate the conflict, up to the establishment of separate teams and limitations on the transfer of information between those teams (sometimes referred to as an "ethical screen").

Important to our potential engagement in these Avoided Cost dockets is our process for addressing potential conflicts which may arise mid-assignment. It may well be that, although no client conflict was identified at the start of an assignment, one arises while the assignment is in progress. For example, we may be asked by a potential investor (who may be a member of the CCEBA) to evaluate a potential asset for which the client may wish to bid. The client conflicts checking process can be re-instigated at

any stage of the assignment life cycle if circumstances change or if more information, previously unavailable, comes to light and suggests that a client conflict may arise as a result.

For this South Carolina Public Service Commission assignment, PA commits to conducting the conflicts check process as each new party is added to the dockets to confirm that PA has no conflicts with any of the parties. Should a potential conflict arise, PA's High Risk Assignment Steering Committee would determine measures that must be taken to mitigate the conflict, up to the establishment of separate teams and limitations on the transfer of information between those teams.

If you have any questions regarding this conflicts check, please contact me at the contact information provided below.

Sincerely,

Matt Mooren

Member of PA's Management Group

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